

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ECIMOS, LLC,)	
)	
Plaintiff,)	
)	
v.)	No. 2:15-cv-02726-JPM-cgc
)	
CARRIER CORPORATION,)	
)	
Defendant.)	

PLAINTIFF'S PROPOSED SPECIAL VOIR DIRE

Plaintiff hereby proposes the following special jury voir dire questions in addition to those typically utilized by the Court:

Have you, anyone in your family, or anyone you consider a relative or friend ever been employed by Carrier Corporation?

Have you, anyone in your family, or anyone you consider a relative or friend ever been employed in the HVAC industry?

Have you, anyone in your family, or anyone you consider a relative or friend ever been employed in the computer programming industry?

Have you, anyone in your family, or anyone you consider a relative or friend ever performed computer programming, whether for work or in your personal time?

Have you, anyone in your family, or anyone you consider a relative or friend ever been employed in an industry that sells manufacturing equipment for use in a plant?

Have you, anyone in your family, or anyone you consider a relative or friend ever been employed in an industry that sells component parts for manufacturing/testing equipment?

Have you, anyone in your family, or anyone you consider a relative or friend ever been employed in an industry that installs manufacturing/testing hardware or equipment in factories or plants?

Respectfully submitted,

/s/ J. O'Neal Perryman
Everett B. Gibson (BPR #7868)
Ralph T. Gibson (BPR #14861)
J. O'Neal Perryman (BPR #32601)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was forwarded to counsel for Defendant via CM/ECF this the 7th day of May, 2018, as follows:

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/s/ J. O'Neal Perryman
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